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EXHIBIT H

Julian, Robert

From: Goodman, Eric R.
Sent: Tuesday, May 28, 2019 6:17 PM
To: Kevin Orsini; Jessica Choi; Karotkin, Stephen; Goren, Matthew (matthew.goren@weil.com); Kreller, Tom; Leblanc, Andrew
Cc: Julian, Robert; Morris, Kimberly S.
Subject: TCC Proposal

Kevin,

The TCC has proposed and continues to propose that the parties engage in a consensual discovery plan to share data and documents to expedite the claims estimation process. As part of that agreement, the TCC would obtain the Plaintiff lawyers' agreement to immediately provide the Debtors and the UCC with access to the Brown Greer database, which includes categories of data stipulated and agreed to by PG&E in the North Bay fire state court litigation ("CMO5 data"). The database also includes subrogation data relating to the claims. The Plaintiffs' lawyers are continuing to populate the Brown Greer database with new claims and update data relating to existing claims and the TCC would obtain and provide that information to the Debtors on a rolling basis.

The Plaintiffs' lawyers are also in the process of collecting documentation, to the extent it exists, relating to the claims in Brown Greer. At our meeting last week, you said you would like to include that documentation as part of the consensual discovery plan, and said that you would provide a list of the documentation you believe should be included. On the call today, you requested the following documentation relating to real property claims: 1) proof of ownership, if it still exists, such as a deed, title, etc; 2) rental agreements or leases; 3) invoices, receipts, photos and estimates relating to property replacement; 4) appraisals pre and post fire, if they exist. You also informed us that you would provide a list of additional requested documents relating to other categories of damage. Please send the list of documents as soon as possible so that we can provide you with dates during the claims estimation process by which we believe it is reasonable to provide such documentation for the claims in Brown Greer.

In exchange for providing the information in Brown Greer and the supporting documentation, the TCC requested that Debtors produce the following information:

1. 2015-2019 Insurance policies and information, including information relating to third party contractor insurance.
2. PG&E's prior Settlement Data (including subro settlement data) of claims arising out of the 2015 Butte fire and the San Bruno explosion.
3. All data that PG&E has used or may use to estimate tort claims, including, without limitation, data used to estimate tort claims for SEC filings and board reports.

Please let us know when you anticipate providing the list of additional requested documents as well as a response to our requested data sets so that we can see if we can reach a resolution.

Best Regards,
Eric

Eric Goodman
Partner

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